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January 13, 2025

**Via ECF**

Hon. Cathy Seibel

U.S. District Court, Southern District of New York

300 Quarropas Street, Courtroom 621

White Plains, New York 10601-4150

Re: *Wayne Ballard v. The County of Rockland, Hon. Thomas E. Walsh II, et al.*  
Docket No.: 24-CV-02944 (CS)

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Dear Judge Seibel:

On behalf of all defendants, we are prepared to e-file all bundled motion documents today in connection with our motions to dismiss Plaintiff's Second Amended Complaint. However, because Plaintiff's opposition includes a grand jury transcript and a video of his police interview, both of which are being filed under seal with the Court's permission, we respectfully request permission to e-file our replies with the portions that deal with those exhibits redacted. We also request permission to file two responsive exhibits under seal; Plaintiff's motion to dismiss the indictment in the underlying criminal prosecution and the District Attorney's Office's opposition to said motion. We would, of course, provide the Court with unredacted copies of all documents. We only propose redacting the publicly-filed copies. We e-mailed Plaintiff's counsel as to this issue but have not yet received a response. Thank you for your consideration.

Respectfully,



Robert B. Weissman